

Exhibit 1

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS

Prep Solutions Ltd.,

PLAINTIFFS,

v.

Elephant Projects, Ltd., et al,

DEFENDANTS.

Case No. 2:23-cv-00211-JRG

**DECLARATION OF RAVINDER CHAUDHRY IN SUPPORT OF DEFENDANT
ELEPHANT HOLDINGS, LTD'S MOTION TO DISMISS**

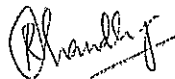
I, Ravinder Chaudhry, declare:

1. I am a senior manager of the defendant in the above captioned matter. I have personal knowledge of the facts contained in this declaration, and if called as a witness, could testify competently to the matters contained herein.
2. I support the operation of the website www.testpreptraining.com (Website), that is owned by a legal entity established under the law of India, and operates with employees located in, New Delhi, India.
3. The Website is available on the world wide web and consumers primarily find the Website through queries made to internet search engines such as google.com, bing.com, or their competitors.
4. The Website includes sample test questions and explanatory answers for a number of technology certification exams that consumers use to show proficiency with technology systems.
5. These question and explanatory answer modules are accessible to consumers through a web browser but are not available for download. Consumers cannot upload content to the Website.

6. Once a consumer has located the Website, he is able to create an account with a first and last name, and an email address.
7. If the consumer elects to purchase access to one of the question and explanatory answer modules, the consumer makes a one-time payment using a Visa/Mastercard account number or a Paypal email address. We do not collect or store address information for purchasers.
8. We do not direct any advertising to specific geographic locations, and we have never directed advertisements to Texas or Texas residents.
9. We have no offices, employees, or operations in Texas, nor have we traveled to Texas for any business purpose.
10. The only sale that I know of for our test question and explanatory answer modules made to Texas is the sale cited in the Complaint for the above captioned matter.
- 11.

I declare under penalty of perjury that the foregoing is true and correct

Dated: September 6, 2023



Ravinder Chaudhry